



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

May 11, 2015

IN REPLY PLEASE **WM-0**
REFER TO FILE: **A4174-2**

TO: Each Supervisor

FROM: Gail Farber *Gail Farber*
Director of Public Works

UNINCORPORATED COUNTY OF LOS ANGELES QUARTERLY STORMWATER COMPLIANCE REPORT – APRIL 2015

In accordance with the Board's request at the March 12, 2013, Public Hearing, this quarterly report summarizes the County's implementation of the Los Angeles County Municipal Separate Storm Sewer System National Pollutant Discharge Elimination System Permit (MS4 Permit) issued by the California Regional Water Quality Control Board, Los Angeles Region (Regional) Board. The MS4 Permit became effective on December 28, 2012, and was issued to 86 Permittees including the County, the Los Angeles County Flood Control District (LACFCD), and 84 cities (excluding the Cities of Avalon, Lancaster, Long Beach, and Palmdale). This report is organized into three parts:

1. Status of compliance in the unincorporated County areas, including key projects, budget expenditures, and budget forecasting;
2. Upcoming major implementation milestones and anticipated regulatory actions; and
3. Status of Regional Board's implementation and enforcement of the MS4 Permit.

In 2006, the Chief Executive Office established the Unincorporated Area (UA) Stormwater Program to address increasing challenges facing the County in the area of stormwater and urban runoff pollution. The purpose of the program is to plan and implement control measures in unincorporated areas and at various County facilities to improve water quality and comply with Federal and State clean water regulations. While each department is responsible for its facilities and operations, the responsibility of overall program coordination was delegated to the Department of Public Works.

Stormwater Compliance in Unincorporated County Areas

Key Projects and Programs

Collaborative Watershed Planning

The County is collaborating with 69 cities in 12 of the 19 watershed groups (Attachment A). Of the 12 watershed groups, 1 is pursuing the Watershed Management Program (WMP) compliance alternative and the remaining 11 are pursuing the Enhanced Watershed Management Program (EWMP) compliance alternative. Each watershed group is responsible for submitting an appropriate watershed planning document including a Coordinated Integrated Monitoring Program (CIMP) plan. Each Permittee's compliance with the MS4 Permit is determined in part by the timely submittal of the planning documents plus their full implementation upon approval by the Regional Board.

During this quarter, the revised WMP plan and the corresponding CIMP plan for the Alamitos Bay/Los Cerritos Channel Watershed Group were resubmitted to the Regional Board for final approval. The 11 EWMP groups continued to develop their EWMP implementation plans, which are due to the Regional Board by June 28, 2015. The Regional Board is expected to finalize their review of the plans in early 2016. The EWMP groups are also in varying stages of revising their CIMP plans and incorporating comments from the Regional Board where necessary. The most significant comment received from the Regional Board pertained to aquatic toxicity testing procedures which could significantly increase monitoring costs.

EWMP Program Environmental Impact Report

The LACFCD is the lead agency in preparing a Program Environmental Impact Report (PEIR) for all EWMPs Countywide. Comments received centered around how the projects would be funded, potential impacts from construction activities, efficacy of EWMP projects, and requests for specific projects. The PEIR is scheduled to be submitted to the Board for certification in May or June 2015 on behalf of the LACFCD and the unincorporated County. Additional information is available at www.LACoH2Osheds.com.

Early Action Projects

The MS4 Permit requires the implementation of structural control measures during the development of EWMP plans. These projects are intended to show progress during the planning phase and must be implemented at a scale that provides meaningful water

quality improvement. Attachment B shows the 12 EWMP groups and the locations of projects described below being implemented by the County.

- Avocado Heights Multiuse Trail Project

This project is designed to provide a safe route for equestrian, bicycle, and pedestrian users in the unincorporated area of Avocado Heights. The trail is approximately 2,300 feet long and constructed with decomposed granite. The project also includes an adjacent bioswale to infiltrate runoff from the trail. The project was funded by the First Supervisorial District's Road Construction Program and completed in September 2014.

- Oxford Retention Basin Multiuse Enhancement Project

This project uses bio-retention and a circulation berm to improve water quality inside the Oxford Retention Basin and in the neighboring Basin E of Marina del Rey Harbor. Other enhancements include sediment removal, increased flood capacity, new landscaping, fencing, and observation decks. Removal of existing vegetation began in December 2014, and the Board approved the construction contract on March 10, 2015. Construction is scheduled to begin in May 2015 and is expected to be completed by early 2016. Funding was provided by the LACFCD, a Proposition 84 grant awarded by the Department of Water Resources, a grant by the Santa Monica Bay Restoration Commission, and Supervisorial District 4 discretionary funds.

- Green Street and Brandon Street Road Improvement Project

This green infrastructure project retrofits about a half-mile roadway on two streets in the unincorporated area of East Pasadena. The purpose is to augment local water supply and reduce pollutant loading into the Los Angeles River by infiltrating urban and stormwater runoff through sustainable practices including permeable pavers, bio-retention planters, sediment filtration catch basins, and an underground infiltration basin. The project was field accepted in March 2015 and is expected to be completed in May 2015. Funding was provided by the State's Proposition 1B Transportation Bond Program.

Integrated Pest Management Program

Public Works and the Department of Agricultural Commissioner/Weights and Measures are expected to finalize the development of a County of Los Angeles Integrated Pest Management Program in June 2015. The Integrated Pest Management Program, intended to promote sustainable practices, is applicable to all County departments

whose operations involve the outdoor use of pesticides, herbicides, or fertilizers. Two workshops were held in June 2014 and March 2015 to receive input from affected departments.

Annual Report

In December 2014, the County submitted an Annual Report to the Regional Board pursuant to MS4 Permit requirements. The Annual Report summarizes the activities of the UA Stormwater Program and incorporates submissions from pertinent County departments. The report is available for download at:

<http://dpw.lacounty.gov/wmd/NPDESRSA/AnnualReport/index.cfm>.

Budget and Funding

Table 1 below shows the approved Net County Cost Budget for the UA Stormwater Program for Fiscal Year 2014-15.

Table 1.

CATEGORY	FY 2014-15
Program Budget	\$13,718,000
Capital Projects	\$8,612,000
Total	\$22,330,000

Table 2 below shows the Fiscal Year 2015-16 budget status as of March 31, 2015.

Table 2.

CATEGORY	FY 2015-16 REQUEST
Ongoing Base Allocation	\$10,154,000
Additional Program Budget	\$8,957,000
Capital Projects	\$3,900,000
Total	\$23,011,000

Of the \$12,857,000 requested for the additional program budget and capital projects in Table 2, \$8,826,000 has been made available to Public Works, with the remaining amount of \$4,031,000 deferred for consideration in final changes in June 2015.

Table 3 below shows the UA Stormwater Program's 5-year budget forecast. The forecast is expected to be refined in the next 6 months as EWMP plans are finalized and more information becomes available.

Table 3.

CATEGORY	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20
Program Cost*	\$19,111,000	\$32,905,000	\$38,000,000	\$38,500,000	\$38,500,000
Capital Projects	\$3,900,000	\$12,000,000	\$15,000,000	\$15,000,000	\$15,000,000
Total	\$23,011,000	\$44,905,000	\$53,000,000	\$53,500,000	\$53,500,000

* Increase due to expanded programmatic controls such as enhanced street sweeping and inspection programs, monitoring activities, and operation and maintenance of new water quality infrastructure.

Public Works is in the process of developing a proposal for a long-term funding strategy to identify potential funding options including bonding, public-private partnerships, asset management, and legislative actions necessary for the establishment of a dedicated stormwater quality revenue source. Public Works will regularly brief the Public Works

Board Deputies and the Chief Executive Office regarding the progress of this strategy, including through this quarterly report.

Staffing

Of the 26 full-time positions budgeted for the UA Stormwater Program, 24 have been filled. Interviews for the remaining positions will commence next quarter.

Stakeholder Outreach and Coordination

The development of WMP, EWMP, and CIMP plans requires extensive coordination and outreach. Periodic public workshops and community events, led by the County, where appropriate, provide opportunities to explain the planning process and receive input from stakeholders including interested residents, businesses, water agencies, and environmental organizations. The following events were held during this quarter:

- On March 9, 2015, the Upper San Gabriel River and Rio Hondo/San Gabriel River EWMP Group held a joint stakeholder meeting at the Arboretum in Arcadia.
- On March 19, 2015, EWMP groups in the Los Angeles River, Ballona Creek, Santa Monica Bay, Dominguez Channel, and Marina del Rey watersheds held a joint stakeholder meeting at the Los Angeles Zoo.

Upcoming Milestones and Actions

The following is a summary of upcoming implementation milestones and anticipated regulatory actions:

- In May 2015, the United States Environmental Protection Agency is expected to adopt revisions to the Marina del Rey Toxic Pollutants Total Maximum Daily Load (TMDL). The revised TMDL would include requirements to address boat hull paint as a source of copper and sediment impairments inside the marina. On June 17, 2014, the Board approved a \$4 million 5-year budget for the Department of Beaches and Harbors to conduct scientific studies and other initial efforts associated with the TMDL. Public Works is assisting Beaches and Harbors in carrying out these studies, which have begun and will finish by fall 2016. The status of these actions is being reported by Beaches and Harbors in separate quarterly reports to the Board.
- On May 14, 2015, the Regional Board is expected to consider issuance of a Time Schedule Order (TSO) to Permittees subject to the Ballona Creek Dry Weather Bacteria TMDL, including the County. Pursuant to the MS4 Permit, a Permittee

can request a TSO from the Regional Board if additional time is needed to comply with certain TMDLs for which the final compliance deadline has passed. The deadline to comply with the TMDL was April 27, 2013, and the County applied for the TSO on April 25, 2013. Public Works is currently reviewing the Regional Board's draft TSO.

- On June 11, 2015, the Regional Board is expected to adopt revisions to the Los Angeles River and Ballona Creek Trash TMDLs. Key changes may include additional monitoring to characterize the amount and type of trash in the rivers. The ramifications of this action are unknown at this time. On the same day, the Regional Board is also expected to adopt the new San Gabriel River Bacteria TMDL.
- By June 28, 2015, EWMP groups must submit draft EWMP plans to the Regional Board for review. The EWMP plans will also undergo public review and comment prior to finalization by the Regional Board. The County is participating in 11 of the 12 EWMP groups.
- Starting July 2015, Permittees, including the County, will begin extensive water quality monitoring in accordance with the approved CIMP plans.

Regional Board's Implementation and Enforcement of the MS4 Permit

Education and Outreach

During this quarter, the Regional Board did not hold any informational sessions on the MS4 Permit.

Enforcement

To date, the Regional Board has taken no enforcement actions related to the current MS4 Permit. However, on October 7, 2014, the Regional Board issued a Notice of Deficiency letter to the Cities of Carson, Compton, Gardena, Irwindale, Lawndale, South El Monte, and West Covina informing them that their draft WMP plans did not meet the basic requirements of the MS4 Permit. As a result, the cities must comply with the strict numeric limits contained in the MS4 Permit or join one of the existing EWMP groups. The City of South El Monte is in the process of joining the Upper Los Angeles River EWMP group and the Upper San Gabriel River CIMP group to carry out applicable monitoring activities.

Each Supervisor
May 11, 2015
Page 8

MS4 Permit Petitions

Shortly after the issuance of the MS4 Permit in December 2012, 37 interested parties, including municipalities and environmental groups, petitioned the State Water Resources Control Board (State Water Board) to challenge the permit. Central to these petitions was the legality of the MS4 Permit's WMP and EWMP compliance mechanisms.

On November 21, 2014, the State Water Board released a Draft Order responding to the petitions. After an in-depth review, Public Works and County Counsel agreed that the Draft Order was a carefully worded defense of the MS4 Permit. On January 21, 2015, Public Works in coordination with County Counsel provided written comments to the State Water Board on behalf of the County and the LACFCD. The comments were generally supportive of the Draft Order and the MS4 Permit because, although highly aggressive, the permit increases regulatory certainty and incentivizes stormwater reuse. On April 24, 2015, the State Water Board released a revised Draft Order, which Public Works and County Counsel are currently reviewing. The State Water Board will be considering adoption of the revised Draft Order on June 16, 2015.

PA:ba

P:\wmpub\Secretarial\2015 Documents\A-memos\4174\UA Stormwater Qrtly Rpt April 2015.doc\15073

Attach.

cc: Chief Executive Office (Rochelle Goff, Jim Jones)
Executive Office

Attachment A
Summary of Watershed Groups

	Group Name	Cities/Permittees Involved	SD
1	Upper Santa Clara River Watershed	Santa Clara, County, LACFCD	5
2	Upper Los Angeles River Watershed Group	Alhambra, Burbank, Calabasas, Glendale, Hidden Hills, La Canada Flintridge, Los Angeles, Montebello, Monterey Park, Pasadena, Rosemead, San Fernando, San Gabriel, San Marino, South Pasadena, Temple City, County, LACFCD	1,2,3,5
3	Los Angeles River Upper Reach 2 Sub Watershed	Bell, Bell Gardens, Commerce, Cudahy, Maywood, Huntington Park, Vernon, LACFCD	1
4	Lower Los Angeles River Watershed Group	Downey, Lakewood, Long Beach, Lynwood, Paramount, Pico Rivera, Signal Hill, South Gate, LACFCD	1,2,4
5	Rio Hondo/San Gabriel River Water Quality Group	Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, County, LACFCD	1,5
6	Upper San Gabriel River EWMP Group	Baldwin Park, Covina, Glendora, Industry, La Puente, County, LACFCD	1,4,5
7	East San Gabriel Valley Watershed Management Group	Claremont, La Verne, Pomona, San Dimas	1,5
8	Lower San Gabriel River Watershed Management Group	Artesia, Bellflower, Cerritos, Diamond Bar, Downey, Hawaiian Gardens, La Mirada, Lakewood, Long Beach, Norwalk, Pico Rivera, Santa Fe Springs, Whittier, LACFCD	4
9	Los Cerritos Channel Watershed Group	Bellflower, Cerritos, Downey, Lakewood, Long Beach, Paramount, Signal Hill, LACFCD	4
10	Malibu Creek Watershed Group	Agoura Hills, Calabasas, Hidden Hills, Westlake Village, County, LACFCD	3
11	Marina del Rey	Culver City, Los Angeles, County, LACFCD	2,3,4
12	North Santa Monica Bay Coastal Watersheds	Malibu, County, LACFCD	3
13	Santa Monica Bay Jurisdictions 2 & 3	El Segundo, Los Angeles, Santa Monica, County, LACFCD	3,4
14	Beach Cities Watershed Management Group	Hermosa Beach, Manhattan Beach, Redondo Beach, Torrance, LACFCD	4
15	Peninsula EWMP Agencies	Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills Estates, County, LACFCD	4
16	Ballona Creek	Beverly Hills, Culver City, Inglewood, Los Angeles, Santa Monica, West Hollywood, County, LACFCD	2,3,4
17	Dominguez Channel Watershed Management Area Group	El Segundo, Hawthorne, Inglewood, Lomita, Los Angeles, County, LACFCD	2,4
18	Alamitos Bay/Los Cerritos Channel Group	County, LACFCD	4
19	Santa Monica Bay Jurisdiction 7	Los Angeles, LACFCD	4

Enhanced Watershed Groups Map (With County 30-Month EWMP Projects)

